

# Exhibit 2

International Paper's Notice of Rule 30(b)(6)  
Deposition of Plaintiffs Georgia Pacific Consumer  
Products, et al.  
(March 13, 2012)

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GEORGIA PACIFIC CONSUMER PRODUCTS, )  
FORT JAMES CORPORATION, and GEORGIA- )  
PACIFIC LLC, )

Plaintiffs, )

v. )

NCR CORPORATION, INTERNATIONAL )  
PAPER CO., and WEYERHAEUSER )  
COMPANY, )

Defendants. )

Civil Action No. 1:11-cv-00483-RJJ

Assigned to: Hon. Robert J. Jonker

**INTERNATIONAL PAPER'S NOTICE OF RULE 30(b)(6) DEPOSITION OF  
PLAINTIFFS GEORGIA PACIFIC CONSUMER PRODUCTS, ET AL.**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), International Paper Company ("International Paper") will take the deposition of Plaintiffs Georgia Pacific Consumer Products, Fort James Corporation, and Georgia Pacific LLC (collectively, "GP") at a location to be mutually agreed upon for the convenience of the corporate representative(s), on March 29, 2012 at 9:00 a.m., before a duly authorized officer certified to administer oaths and take depositions. The deposition will be recorded by stenographic and/or videographic means and will be taken for the purpose of discovery, for use as evidence at any hearing or trial, and for any other purposes authorized by law and will continue from day to day until completed.

Pursuant to Rule 30(b)(6) International Paper requests that GP designate a person or persons to testify about information known or reasonably available to GP regarding the subject matters listed on the attached Exhibit A.

International Paper requests that GP provide a written designation of the name(s) and position(s) of the persons who will testify on behalf of GP and, for each person so designated, the matters listed on Exhibit A as to which he or she will testify.

Dated: March 13, 2012

s/Michael Dominic Meuti

John D. Parker  
Michael Dominic Meuti  
Baker & Hostetler LLP  
PNC Center  
1900 East 9<sup>th</sup> Street, Suite 3200  
Cleveland, OH 44114-3482  
Telephone: 216.861.7709  
Facsimile: 216.696.0740  
Email: [jparker@bakerlaw.com](mailto:jparker@bakerlaw.com)  
[mmeuti@bakerlaw.com](mailto:mmeuti@bakerlaw.com)

John F. Cermak, Jr.  
Sonja A. Inglin  
Baker & Hostetler LLP  
12100 Wilshire Blvd., 15th Floor  
Los Angeles, CA 90025  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: [jcermak@bakerlaw.com](mailto:jcermak@bakerlaw.com)  
[singlin@bakerlaw.com](mailto:singlin@bakerlaw.com)

Attorneys for Defendant/  
Counterclaimant/Crossclaimant  
International Paper Company

**EXHIBIT A**

**DEFINITIONS**

1. “Bryant Mill” refers to the industrial complex located in Kalamazoo, Michigan that was previously engaged in manufacturing paper referred to in Paragraph 95 of the FAC.
2. “CCP” refers to NCR’s carbonless-copy-paper product, sometimes known as “NCR Paper” or “No Carbon Required” paper, including any component thereof (e.g., emulsion, capsules, Aroclor, base paper, CF, CFB, and/or CB).
3. “CCP broke and/or trim” refers to byproducts of manufacturing carbonless copy paper containing PCBs. This term shall include the terms “CCP Coating Broke” and “CCP Converter Trim” as used in GP’s First Requests for Production of Documents to NCR.
4. “CCP post-consumer waste” refers to CCP that had been used and/or discarded by end users.
5. The term “including” means including, but not limited to.
6. “NCR” refers to Defendant NCR Corporation, including its subsidiaries, divisions, affiliates, and predecessors, their present or former partners, officers, directors, employees, or agents, and any other person acting or purporting to act on their behalf. The term specifically includes the former Appleton Coated Paper Company, the former Combined Paper Mills, Inc., and Systemedia.
7. “PCBs” refers to polychlorinated biphenyls, whether manufactured by Monsanto Company or any other entity.
8. The term “recovered fiber” refers to each of the following:
  - paper, paperboard, and fibrous materials from retail stores, office buildings and/or homes after they have passed through their end-usage as a consumer item, including used corrugated boxes, old newspapers, old magazines, mixed waste paper, tabulating cards, and used cordage;

- all paper, paperboard, and fibrous materials that enter and are collected from municipal solid waste;
- residual dry paper and paperboard generated after the completion of the papermaking process, including (a) envelope cuttings, bindery trimmings, and other residual paper and paperboard resulting from printing, cutting, forming, and other converting operations; (b) bag, box, and carton manufacturing wastes; and (c) butt rolls, mill wrappers, and rejected unused stock;
- repulped finished paper and paperboard from obsolete inventories of paper and paperboard manufacturers, merchants, wholesalers, dealers, printers, converters, or others; and
- any paper scrap or trim generated in a paper mill prior to completion of the papermaking process.

However, “recovered fiber” shall be construed to exclude NCR broke and/or trim, as defined above.

9. The term “recycling” refers to the process(es) used to repulp, deink, bleach, clean, and/or wash any recovered fiber or NCR broke and/or trim as part of using that recovered fiber or NCR broke and/or trim to make new paper products.

10. The term “St. Regis” refers to St. Regis Paper Company.

### **TOPICS FOR EXAMINATION**

1. The recycling or other use in paper production of CCP broke and/or trim at the Bryant Mill between November 8, 1946 and June 30, 1956, including without limitation CCP received from brokers.

2. The recycling or other use in paper production of CCP broke and/or trim at the Bryant Mill between July 1, 1956 and August 5, 1966, including without limitation CCP received from brokers.

3. The recycling or other use in paper production of recovered fiber containing PCBs at the Bryant Mill between November 8, 1946 and June 30, 1956, including without limitation PCB-containing recovered fiber received from brokers.

4. The recycling or other use in paper production of recovered fiber containing PCBs at the Bryant Mill between July 1, 1956 and August 5, 1966, including without limitation PCB-containing recovered fiber received from brokers.

5. The recycling or other use in paper production of CCP post-consumer waste at the Bryant Mill between November 8, 1946 and June 30, 1956, including without limitation CCP post-consumer waste received from brokers.

6. The recycling or other use in paper production of CCP post-consumer waste at the Bryant Mill between July 1, 1956 and August 5, 1966, including without limitation CCP post-consumer waste received from brokers.

7. The discharge of PCBs from the Bryant Mill in any manner from November 8, 1946 until June 30, 1956.

8. The discharge of PCBs from the Bryant Mill in any manner from July 1, 1956 until August 5, 1966.

9. Any other mill, facility or operation within, or in the vicinity of, the Site that GP contends was a “facility” (as defined in CERCLA) from which there was a “release” or “threatened release” (as such terms are defined in CERCLA) of PCBs and that was “owned” or “operated” (as such terms are defined in CERCLA) by International Paper or any predecessor in interest to International Paper.

10. Any other basis on which GP contends that International Paper is a liable party under CERCLA with respect to the Site.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2012, I served the foregoing International Paper's Notice of 30(b)(6) Deposition of Plaintiffs Georgia Pacific Consumer Products, et al. by email upon the following counsel of record:

Douglas M. Garrou	dgarrou@hunton.com
George P. Sibley	gsibley@hunton.com
Joseph C. Kearfott	jkearfott@hunton.com
Kathy Robb	krobb@hunton.com
Jan M. Conlin	jmconlin@rkmc.com
Tara Dawn Falsani	tdfalsani@rkmc.com
Peter A. Smit	pasmit@varnumlaw.com
Eric W. Ha	eha@sidley.com
Evan B. Westerfield	evanwesterfield@sidley.com
Margaret R. Sobota	msobota@sidley.com
Sandra C. Goldstein	sgoldstein@cravath.com
Evan C. Chesler	echesler@cravath.com
Darin P. McAtee	dmcatee@cravath.com
Geoffrey A. Fields	gfields@dickinsonwright.com
Meline G. MacCurdy	mmaccurdy@martenlaw.com
Linda R. Larson	llarson@martenlaw.com
Bradley M. Marten	bmarten@martenlaw.com
Mark W. Schneider	MWSchneider@perkinscoie.com
Karen M. McGaffey	KMcGaffey@perkinscoie.com
J. Christopher Baird	JCBaird@perkinscoie.com
Dean P. Laing	Dean.Laing@wilaw.com
Jeffrey N. Martin	jmartin@hunton.com
Douglas A. Dozeman	ddozeman@wnj.com
Scott M. Watson	swatson@wnj.com
Michael Dunning	MDunning@perkinscoie.com
Dustin P. Ordway	DPOrdway@ordwaylawfirm.com
Christopher D. Thomas	Christopher.D.Thomas@squiresanders.com

s/Michael Dominic Meuti  
Michael Dominic Meuti